

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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DEANA L. GAFFNEY	:	UNITED STATES BANKRUPTCY
	:	COURT FOR THE EASTERN DISTRICT
DYNAMIC EQUITY PARTNERS, INC.	:	OF PENNSYLVANIA
Movant	:	
vs.	:	
DEANA L. GAFFNEY	:	
Debtor	:	
WILLIAM C. MILLER	:	
Trustee	:	
	:	Case No.: 21-11024-amc
	:	

**AMENDED NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

DYNAMNIC EQUITY PARTNERS, INC., has filed a Motion for Relief from Stay, with the Court for Relief from the Automatic stay of Section 362.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in this motion, then on or before **July 29, 2021** you or your attorney must do all of the following:

(a) File an answer explaining your position at:

United States Bankruptcy Court  
Robert N.C. Nix Building  
900 Market Street, Suite 400  
Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) Mail a copy to Movant's attorney:  
Adrienne N. Anderson, Esquire  
The Law Offices of Michael Kuldiner, P.C.  
922 Bustleton Pike  
Feasterville, PA 19053

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above the attend the hearing, the court may enter an order granting the relief requested in this motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashley M. Chan, the United States Bankruptcy Judge in Courtroom 4 at the United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Suite 400, Philadelphia, PA 19107-4299 on **August 10, 2021, at 11:00 a.m.**, or as soon thereafter as counsel can be heard to consider this motion.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Movant is Dynamic Equity Partners, Inc. having a mailing address of P.O. Box 85, Huntingdon Valley, PA 19006 (the "Movant").

Law Offices of Michael Kuldiner, P.C.  
922 Bustleton Pike, 1<sup>st</sup> Floor  
Feasterville, PA 19053

Date: 07/16/2021

By: 

Adrienne N. Anderson, Esquire  
Attorney I.D. 306424

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		:	

**CERTIFICATE OF SERVICE**

I, Adrienne N. Anderson, Esquire, attorney for Movant, do hereby certify that I caused true and correct copies of the foregoing Motion of DYNAMIC EQUITY PARTNERS, INC. for Relief From Automatic Stay and AMENDED NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE to be served on July 16, 2021, by first class mail, and/or electronic means upon those listed below:

Debtor(s)

Deana L. Gaffney  
533 Fern Street  
Lansdowne, PA 19050

Trustee

William C. Miller, Esquire  
P.O. Box 1229  
Philadelphia, PA 19105  
**VIA ECF**

Attorney for Debtor(s)

Zachary Perlick, Esquire  
1420 Walnut Street, Suite 718  
Philadelphia, PA 19102  
**VIA ECF**

Office of the US Trustee

United States Trustee  
Office of the U.S. Trustee  
200 Chestnut Street, Suite 502  
Philadelphia, PA 19106

Law Offices of Michael Kuldiner, P.C.  
922 Bustleton Pike, 1<sup>st</sup> Floor  
Feasterville, PA 19053

Date: 07/16/2021

By: 

Adrienne N. Anderson, Esquire  
Attorney for Movant  
Attorney I.D. 306424  
Phone: 215-942-2100; Fax: 215-942-9664